

GIBSON DUNN

Gibson, Dunn & Crutcher LL

200 Park Avenue  
New York, NY 10166-0193  
Tel 212.351.4000  
www.gibsondunn.com

Stephanie L. Silvano  
Direct: +1 212.351.2680  
Fax: +1 212.716.0780  
SSilvano@gibsondunn.com

July 13, 2022

VIA ECF

The Honorable Douglas E. Arpert  
United State District Court for the District of New Jersey  
Clarkson S. Fisher Building & U.S. Courthouse  
402 East State Street  
Trenton, NJ 08608

Re: *Gustavo Martínez v. City of Asbury Park et al.*, No. 3:20-cv-08710-AET-DEA

Dear Judge Arpert:

We serve as counsel for Plaintiff Gustavo Martínez in the above-captioned matter (the “Action”). We write jointly on behalf of all parties to provide a joint status report and respectfully request that the Court provide the parties an additional 30 days within which to either submit papers resolving the Action or provide a joint status report if circumstances prevent resolution of the matter by then.

On January 11, 2022, the parties reached a settlement agreement in principle at a settlement conference before Your Honor. The current deadline for the parties to submit papers resolving the Action or providing a joint status report is today, July 13, 2022.

To date, the parties have exchanged drafts of a settlement agreement. Most recently, on July 13, 2022, counsel for Plaintiff and counsel for the Asbury Park Defendants met and conferred to substantially narrow the remaining issues in the draft settlement agreement. But the parties have not yet finalized the draft settlement agreement and those efforts remains ongoing. To provide the necessary time to finalize a settlement agreement, the parties respectfully request that the Court grant the parties an additional 30 days within which to either submit papers resolving the Action or provide a joint status report if circumstances prevent resolution of the matter by then. All parties consent to this joint request.

Respectfully submitted,

/s/ *Stephanie L. Silvano*

cc: All counsel of Record (via ECF)